

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

217/782-2113

"RENEWAL"  
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Nissan Forklift Corp., NA  
Attn.: Tom J. Carlson  
240 North Prospect Street  
Marengo, Illinois 60152

<u>Application No.:</u> 95110071	<u>I.D. No.:</u> 111065AAQ
<u>Applicant's Designation:</u>	<u>Date Received:</u> November 17, 1995
<u>Operation of:</u> Forklift Truck Assembly Plant	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date</u> <sup>2</sup> : TO BE DETERMINED
<u>Source Location:</u> 240 North Prospect, Marengo, McHenry County	
<u>Responsible Official:</u> Tom Carlson, Facilities Manager	

This permit is hereby granted to the above-designated Permittee to OPERATE a forklift truck assembly plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Jonathan Sperry at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:JS:psj

cc: Illinois EPA, FOS, Region 1  
CES  
Lotus Notes

<sup>1</sup> This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit.

<sup>2</sup> Except as provided in condition 8.7 of this permit.

# TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0 OVERALL SOURCE CONDITIONS	10
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/ Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)	17
6.1 Description of ERMS	
6.2 Applicability	
6.3 Obligation to Hold Allotment Trading Units (ATUs)	
6.4 Market Transaction	
6.5 Emission Excursion Compensation	
6.6 Quantification of Seasonal VOM Emissions	
6.7 Annual Account Reporting	
6.8 Allotment of ATUs to the Source	
6.9 Recordkeeping for ERMS	
6.10 Exclusions from Further Reductions	

	<u>PAGE</u>
7.0 UNIT SPECIFIC CONDITIONS	24
7.1 Units SPB2, 3, 5, & 6 Spray Paint Booths #2, 3, 5, & 6 Controls F2, 3, 5 & 6 Filters #2, 3, 5, & 6	
7.2 Unit PPL Powder Paint Line Control PPLF Powder Paint Line Filter	
7.3 Units GO, CO, DO Powder Paint Line Parts Washers and Ovens	
8.0 GENERAL PERMIT CONDITIONS	46
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	
8.5 Testing Procedures	
8.6 Reporting Requirements	
8.7 Obligation to Comply with Title I Requirements	
9.0 STANDARD PERMIT CONDITIONS	51
9.1 Effect of Permit	
9.2 General Obligations of Permittee	
9.3 Obligation to Allow Illinois EPA Surveillance	
9.4 Obligation to Comply with Other Requirements	
9.5 Liability	
9.6 Recordkeeping	
9.7 Annual Emissions Report	
9.8 Requirement for Compliance Certification	
9.9 Certification	
9.10 Defense to Enforcement Actions	
9.11 Permanent Shutdown	
9.12 Reopening And Reissuing Permit For Cause	
9.13 Severability Clause	
9.14 Permit Expiration and Renewal	
10.0 ATTACHMENTS	
10.1 Attachment 1 - Emissions of Particulate Matter from New Process Emission Units	1-1
10.2 Attachment 2 - Example Certification by a Responsible Official	2-1
10.3 Attachment 3 - Guidance on Revising This Permit	3-1
10.4 Attachment 4 - Guidance on Renewing This Permit	4-1

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

1.0 SOURCE IDENTIFICATION

1.1 Source

Nissan Forklift Corp., NA  
240 North Prospect Street  
Marengo, Illinois 60152  
815/568-0061

I.D. No.: 111065AAQ  
Standard Industrial Classification: 3537, Trucks & Tractors -  
Industrial

1.2 Owner/Parent Company

Nissan Forklift Corp., NA  
240 North Prospect Street  
Marengo, Illinois 60152

1.3 Operator

Nissan Forklift Corp., NA  
240 North Prospect Street  
Marengo, Illinois 60152

Tom J. Carlson  
815/568-0061

1.4 General Source Description

Nissan Forklift corporation is located at 240 North Prospect Street in Marengo. The source assembles electric and gas forklift trucks and manufactures structural steel components to produce such items as frames, platforms, and fork assemblies. In addition, forklift trucks are painted on site.

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
gal	gallon
hr	hour
HAP	Hazardous Air Pollutants
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mft <sup>3</sup>	Million cubic feet
Mg	Metric Tonnes or Megagrams
mmBtu	Million Btus
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
SO <sub>2</sub>	Sulfur Dioxide
T	Ton

PROPOSED RENEWAL CAAPP PERMIT  
 Nissan Forklift Corp., NA  
 I.D. No.: 111065AAQ  
 Application No.: 95110071  
 July 22, 2004

T1	Title I - identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
Wt	Weight
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

Gas Driven Air Compressor  
Gas Hot Air Furnace #1  
Gas Hot Air Furnace #2  
Gas Hot Air Furnace #3  
Gas Hot Air Furnace #4  
500 Gallon Gasoline Storage Tank

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

Welding Machines

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a) (4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a) (10)].

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

### 3.2 Addition of Insignificant Activities

- 3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).



PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
SPB2	Binks Paint Spray Booth (Counterweight Spray Paint Booth #2)	Between 1988 and 1992	Filter #2
SPB3	Binks Paint Spray Booth (Frame Spray Paint Booth #3)	Between 1988 and 1992	Filter #3
SPB5	Binks Paint Spray Booth (Finish Spray Paint Booth #5)	Between 1988 and 1992	Filter #5
SPB6	Binks Paint Spray Booth (Prime Spray Paint Booth #6)	Between 1988 and 1992	Filter #6
PPL	Nordson Powder Paint Spray Booth (Powder Paint Line)	June 1997	Filter
GO	2 Therm-Tron-X Parts Washers (Powder Paint Line Parts Washers, Natural Gas-Fired, 2.0 mmBtu/Hr, Each)	June 1997	None
CO	Natural Gas-Fired Cure Oven (6.5 mmBtu/Hr)	June 1997	None
DO	Natural Gas-Fired Dry Off Oven (4.4 mmBtu/Hr)	June 1997	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. The emission of smoke or other particulate matter from any emission unit shall not exceed an opacity of greater than 30 percent, except that an opacity of greater than 30 percent but less than 60 percent shall be allowed for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 feet) radius from the center point of any other such emission unit owned or operated by the Permittee, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period, pursuant to 35 IAC 212.123 and 212.124.

5.2.3 Operating Program for Particulate Matter

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].
- d. All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods [35 IAC 212.307].

#### 5.2.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### 5.2.5 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.6 Future Emission Standards

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.7 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to the Illinois EPA, Compliance Section.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO <sub>x</sub> )	2.85
Particulate Matter (PM)	1.40
Sulfur Dioxide (SO <sub>2</sub> )	0.10
Volatile Organic Material (VOM)	10.22
HAP, not included in VOM or PM	--
Total	14.57

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for Storage Vessels

Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 IAC Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel [35 IAC 218.129(f)].

5.6.3 Records for Natural Gas Usage

The Permittee shall maintain records of the following items for the units which combust natural gas so as to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- a. Natural gas usage of the source, Mft<sup>3</sup>/mo and Mft<sup>3</sup>/yr; and
- b. Records of the monthly and annual aggregate NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOM emissions from the combustion of natural gas at the source shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

#### 5.6.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

### 5.7 General Reporting Requirements

#### 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(iii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

#### 5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

### 5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

## 5.9 General Compliance Procedures

### 5.9.1 General Procedures for Calculating Fuel Combustion Emissions

To determine compliance with Condition 5.5.1, emissions from the combustion of natural gas at the source shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/Mft<sup>3</sup>)</u>
NO <sub>x</sub>	100
PM	11.9
SO <sub>2</sub>	0.6
VOM	2.8

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 -< 10 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Fifth Edition, October, 1996. VOM emission factor based on TOC factor corrected for 52% methane contribution.

Natural Gas Fuel Combustion Emissions (lb) = (Natural Gas Consumed, Mft<sup>3</sup>) x (The Appropriate Emission Factor, lb/Mft<sup>3</sup>)



## 6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

## 6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

## 6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
  - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

#### 6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

#### 6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

#### 6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
  - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
  - i. Actual seasonal emissions of VOM from the source;
  - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
- iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
- v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
- vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 84 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 9.5133 tons per season.

This determination includes adjustment to actual emissions to account for non-compliance with requirements effective through 1996 that became applicable after the year selected as baseline year at the source, e.g., 35 IAC 218.204(j)(4)(A), pursuant to 35 IAC 205.320(e)(2) as further addressed in Section 7 of this permit.

- iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
  - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units
- Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
  - ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
  - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

#### 6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

#### 6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
- i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
  - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
  - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

##### Large Gas Burners

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

## 7.0 UNIT SPECIFIC CONDITIONS

- 7.1 Units SPB2, 3, 5, & 6 Spray Paint Booths #2, 3, 5, & 6  
Controls F2, 3, 5 & 6 Filters #2, 3, 5, & 6

### 7.1.1 Description

The source operates these solvent based paint spray booths to paint frames, guards, platforms, and other large structural components of forklift trucks.

### 7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
SPB2	Binks Paint Spray Booth (Counterweight Spray Paint Booth #2)	Filter #2
SPB3	Binks Paint Spray Booth (Frame Spray Paint Booth #3)	Filter #3
SPB5	Binks Paint Spray Booth (Finish Spray Paint Booth #5)	Filter #5
SPB6	Binks Paint Spray Booth (Prime Spray Paint Booth #6)	Filter #6

### 7.1.3 Applicability Provisions and Applicable Regulations

- a. Each Paint Spray Booth is an "affected coating line" for the purpose of these unit-specific conditions.
- b. Each affected coating line is subject to the emission limits identified in Condition 5.2.2.
- c. The affected coating lines are subject to 35 IAC 212.321(a), which provides that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].



PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- ii. Because the expected process weight rate for each affected coating line is 100 pounds per hour, the allowable PM emission rate for each affected coating line set by 35 IAC 212.321 is 0.55 pounds per hour.
- d. Pursuant to 35 IAC 218.204, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. The emission limitations are as follows:
  - i. Heavy Off-Highway Vehicle Products  
Coating/Extreme Performance Prime Coat [35 IAC 218.204(k)(1)]:

kg/l	lb/gal
0.42	3.5
  - ii. Heavy Off-Highway Vehicle Products  
Coating/Extreme Performance Top-Coat (Air Dried) [35 IAC 218.204(k)(2)]:

kg/l	lb/gal
0.42	3.5
  - iii. Heavy Off-Highway Vehicle Products  
Coating/Final Repair Coat (Air Dried) [35 IAC 218.204(k)(3)]:

kg/l	lb/gal
0.42	3.5

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected coating line is not subject to the NSPS for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60 Subpart MM because the affected coating line is not a prime coat operation, a guide coat operation, or a topcoat operation at an automobile or light-duty truck assembly plant.

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- b. The affected coating lines are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM<sub>10</sub>, as identified in 35 IAC 212.324(a)(1).
- c. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].
- d. This permit is issued based on the affected coating lines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating lines do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.1.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the paint booth filters, including periodic inspection, routine maintenance and prompt repair of defects.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating lines are subject to the following:

- a. Emissions and operation of the affected coating lines shall not exceed the following limits:

Coating Usage		Coating VOM	Cleaning		VOM Emissions	
(gal/day)	(gal/yr)	Content (lb VOM/gal)	Solvent Usage (lb/day)	(T/yr)	(lb/day)	(T/yr)
70.80	5,280	3.5	21.24	2.76	269.04	10.00

These limits are based on the maximum coating usage, the maximum allowable content of the coating, the maximum cleaning solvent usage, and the maximum hours of operation.

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- c. The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emissions limitations and other appropriate terms and conditions in this permit that limit the emissions from the affected coating lines below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application. [T1N]

#### 7.1.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

- a. On at least an annual basis:
  - i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
  - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.
  - iii. Upon written request from the Permittee, the Illinois EPA may waive this requirement on a year-by-year basis, if prior testing shows a margin of compliance and no significant changes in coating supplies have occurred.
- b. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) [35 IAC 218.105(a) and 218.211(a)].

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions 5.5.1 and 7.1.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.1.7, which include the following [Section 39.5(7)(e) of the Act]:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- b. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on the affected coating line; and
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected coating line.
- c. Records addressing use of good operating practices for the paint booth filters:
  - i. Records for periodic inspection of the paint booth filters with date, individual performing the inspection, and nature of inspection; and

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- d. Records of the coating usage for the affected coating line, gal/day, gal/mo, and gal/yr;
- e. The VOM content of coatings, % by Wt;
- f. Density of coatings, lb/gal;
- g. Records of the solvent usage for the affected coating line, gal/day, gal/mo, and gal/yr;
- h. Density of solvent, lb/gal; and
- i. The aggregate monthly and annual PM and VOM emissions from the affected coating line based on the material usage, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3(d) (see also 35 IAC 218.204) within 30 days following the occurrence of the violation.
- b. Continued operation of any affected coating line with a defect in the paint booth filters that may result in emissions of particulate matter in excess of limits in Condition 7.1.3(c) within 30 days of such an occurrence.
- c. Emissions of VOM in excess of limits in Condition 7.1.6 within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

#### 7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.1.3(b) and (c) is assumed to be achieved by proper operation of the paint booth filters, as addressed by Condition 7.1.5.
- b. To determine compliance with Condition 5.5.1, PM and VOM emissions from the affected coating line shall be calculated based on the following:

- i. Particulate Matter Emissions:

$$\text{PM (lb)} = (\text{Coating Usage, gal}) \times (\text{Coating Density, lb/gal}) \times (\text{Wt \% Solids}) \times [1 - (\text{Transfer Efficiency}^* (\%)/100)] \times [1 - (\text{Paint Booth Filter Efficiency}^* (\%)/100)]$$

\* As specified by manufacturer or vendor of the spray booths and paint booth filters

- ii. Volatile Organic Material Emissions:

$$\text{VOM (lb)} = (\text{Coating Usage, gal}) \times (\text{Coating Density, lb/gal}) \times (\text{VOM Content of Coating, \% by Wt.}) + (\text{Cleaning Solvent Usage, gal}) \times (\text{Solvent Density, lb/gal})$$

7.2 Unit PPL Powder Paint Line  
Control PPLF Powder Paint Line Filter

7.2.1 Description

The source operates this powder paint spray booth to paint frames, guards, platforms, and other large structural components of forklift trucks. The paint applied in this powder paint spray booth is cured in a natural gas-fired curing oven (see Section 7.3).

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
PPL	Nordson Powder Paint Spray Booth (Powder Paint Line)	Filter

7.2.3 Applicability Provisions and Applicable Regulations

- a. The Powder Paint Line is an "affected coating line" for the purpose of these unit-specific conditions.
- b. The affected coating line is subject to the emission limits identified in Condition 5.2.2.
- c. The affected coating line is subject to 35 IAC 212.321(a), which provides that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].
  - ii. Because the expected process weight rate for the affected coating line is less than 100 pounds per hour, the allowable PM emission rate for the affected coating line set by 35 IAC 212.321 is 0.55 pounds per hour.

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

d. Pursuant to 35 IAC 218.204, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. The emission limitations are as follows:

i. Heavy Off-Highway Vehicle Products  
Coating/Extreme Performance Prime Coat [35  
IAC 218.204(k) (1)]:

kg/l	lb/gal
0.42	3.5

ii. Heavy Off-Highway Vehicle Products  
Coating/Extreme Performance Top-Coat (Air  
Dried) [35 IAC 218.204(k) (2)]:

kg/l	lb/gal
0.42	3.5

iii. Heavy Off-Highway Vehicle Products  
Coating/Final Repair Coat (Air Dried) [35 IAC  
218.204(k) (3)]:

kg/l	lb/gal
0.42	3.5

iv. All other coatings are subject to the emission  
limitations for miscellaneous metal parts and  
products coating [35 IAC 218.204(k) (4)]:

A. Miscellaneous Metal Parts and Products  
Coating/Extreme Performance Coating  
(Baked) [35 IAC 218.204(j) (2) (B)]:

kg/l	lb/gal
0.40	3.3

B. Miscellaneous Metal Parts and Products  
Coating/All Other Coatings (Baked) [35  
IAC 218.204(j) (4) (B)]:



PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

kg/l	lb/gal
0.34	2.8

#### 7.2.4 Non-Applicability of Regulations of Concern

- a. The affected coating line is not subject to the NSPS for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60 Subpart MM because the affected coating line is not a prime coat operation, a guide coat operation, or a topcoat operation at an automobile or light-duty truck assembly plant.
- b. The affected coating line is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM<sub>10</sub>, as identified in 35 IAC 212.324(a)(1).
- c. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].
- d. This permit is issued based on the affected coating line not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating line does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

#### 7.2.5 Operational and Production Limits and Work Practices

- a. The affected coating line shall only be operated with coatings containing no organic materials or HAPs. This requirement was established in Permit 97050032.
- b. The Permittee shall follow good operating practices for the dry filter system, including periodic inspection, routine maintenance and prompt repair of defects.

#### 7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating line is subject to the following:

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- a. Emissions and operation of the powder paint booth shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Process Rate (lb/hr)</u>	<u>Operating Hours (hr/yr)</u>	<u>Particulate Matter Emissions</u>	
			<u>(lb/hr)</u>	<u>(T/yr)</u>
Powder Paint Booth	62.25	3,120	0.55	0.86

These limits are based on 35 IAC 212.321, the maximum powder coating usage, and the maximum hours of operation. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- c. The above limitations contain revisions to previously issued construction permit 97050032. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this construction permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limit on the hours of operation has been increased from 2,080 hours per year to 3,120 hours per year and the annual PM emission limit has been increased from 0.58 ton 0.86 ton. [T1R]

#### 7.2.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- a. On at least an annual basis:
  - i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
  - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.2.9(b) directly reflect the application of such material and separately account for any additions of solvent.
  - iii. Upon written request from the Permittee, the Illinois EPA may waive this requirement on a year-by-year basis, if prior testing shows a margin of compliance and no significant changes in coating supplies have occurred.
- b. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) [35 IAC 218.105(a) and 218.211(a)].

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with Conditions 5.5.1, 7.2.3, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.2.7, which include the following [Section 39.5(7)(e) of the Act]:
  - i. Identification of material tested;

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- b. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating as applied on each affected coating line; and
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each affected coating line.
- c. Records addressing use of good operating practices for the dry filter system:
- i. Records for periodic inspection of the dry filter system with date, individual performing the inspection, and nature of inspection; and
  - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- d. Records of the coating usage for the affected coating line, lb/mo and lb/yr;
- e. The VOM content of coatings, % by Wt;
- f. The solvent usage for the affected coating line, gal/mo and gal/yr;
- g. Density of solvent, lb/gal;
- h. The operating schedule of the affected coating line, hr/mo and hr/yr; and

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- i. The aggregate monthly and annual PM and VOM emissions from the affected coating line based on the material usage, with supporting calculations.

#### 7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected coating line with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.2.3(d) (see also 35 IAC 218.204) within 30 days following the occurrence of the violation.
- b. Continued operation of the affected coating line with a defect in the paint booth filters that may result in emissions of particulate matter in excess of limits in Condition 7.2.3(c) and/or 7.2.6 within 30 days of such an occurrence.

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. Compliance with Condition 7.2.3(c) is assumed to be achieved by proper operation of the dry filter system, as addressed by Condition 7.2.5(b).
- b. To determine compliance with Condition 5.5.1, PM and VOM emissions from the affected coating line shall be calculated based on the following:
  - i. Particulate Matter Emissions:

$$\text{PM (lb)} = (\text{Coating Usage, lb}) \times [1 - (\text{Transfer Efficiency}^* (\%)/100)] \times [1 - (\text{Dry Filter Efficiency}^* (\%)/100)]$$

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

\* As specified by manufacturer or vendor of  
the spray booths and dry filter system

ii. Volatile Organic Material Emissions:

VOM (lb) = (Coating Usage, lb) x (VOM Content  
of Coating, % by Wt.) + (Cleaning Solvent  
Usage, gal) x (Solvent Density, lb/gal)

7.3 Units GO, CO, DO Powder Paint Line Parts Washers and Ovens

7.3.1 Description

The source operates two three stage washers where a cleaning solution is to remove oil and dirt from the parts prior to coating. The parts are then dried a drying oven.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
GO	2 Therm-Tron-X Parts Washers (Powder Paint Line Parts Washers, Natural Gas-Fired, 2.0 mmBtu/Hr, Each)	None
CO	Natural Gas-Fired Cure Oven (6.5 mmBtu/Hr)	None
DO	Natural Gas-Fired Dry Off Oven (4.4 mmBtu/Hr)	None

7.3.3 List of Emission Units and Pollution Control Equipment

- a. The Powder Paint Line Parts Washers, the Cure Oven, and the Dry Off Oven are "affected parts washers and ovens" for the purpose of these unit-specific conditions.
- b. The affected parts washers and ovens are subject to the emission limits identified in Condition 5.2.2.
- c. The affected parts washers and ovens are subject to 35 IAC 212.321(a), which provides that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- ii. Because the expected process weight rate for the affected washers and ovens is less than 100 pounds per hour, the allowable PM emission rate for each affected washer or oven set by 35 IAC 212.321 is 0.55 pounds per hour.
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].
- e. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to photochemically reactive material [35 IAC 218.301].

#### 7.3.4 Non-Applicability of Regulations of Concern

- a. The affected parts washers are not subject to the NESHAP for Halogenated Solvent Cleaning, 40 CFR 63 Subpart T because the affected washer is not a batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
- b. The affected parts washers and ovens are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the drying oven for the affected parts washers and ovens are not by definition a fuel combustion emission units.
- c. The affected parts washers and ovens are not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Sources, because the actual heat input of each of these units is less than 73.2 MW (250 mmBtu/hr) and the affected parts washers and ovens are not by definition fuel combustion emission units.
- d. The affected parts washers and ovens are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM<sub>10</sub>, as identified in 35 IAC 212.324(a) (1).



PROPOSED RENEWAL CAAPP PERMIT  
 Nissan Forklift Corp., NA  
 I.D. No.: 111065AAQ  
 Application No.: 95110071  
 July 22, 2004

- e. The affected parts washers are not subject to 35 IAC 218 Subpart E: Solvent Cleaning, because the affected parts washers are not cold cleaning operations, open top vapor degreasers, or conveyORIZED degreasers.
- f. This permit is issued based on the affected parts washers and ovens not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected parts washers and ovens do not use an add-on control device to achieve compliance with an emission limitation or standard.

#### 7.3.5 Operational and Production Limits and Work Practices

- a. The affected parts washers shall only be operated with cleaning solutions containing no solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. This requirement is necessary to ensure the affected parts washers are not subject to 40 CFR 63, Subpart T, NESHAP for Halogenated Solvent Cleaning.

#### 7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected parts washers and ovens are subject to the following:

- a. i. Emissions and operation of the parts washers shall not exceed the following limits:

Item of Equipment	Solvent Usage (lb/hr)	Operating Hours (hr/yr)	VOM Content (% by wt.)	VOM Emissions (lb/hr) (T/yr)
Parts Washers	74.18	3,120	1.51	1.12 1.75

- ii. These limits are based on the maximum parts cleaning solvent usage, the maximum amount of VOM in the solvent, and the maximum hours of operation.

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

iii. The above limitations contain revisions to previously issued construction permit 97050032. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this construction permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limit on the hours of operation has been increased from 2,080 hours per year to 3,120 hours per year and the annual VOM limit has been increased from 1.17 tons to 1.75 tons. [T1R]

b. i. Emissions and operation of the Cure Oven, the Powder Paint Line Parts Washers, and the Dry Off Oven shall not exceed the following limits:

Combined		E M I S S I O N S					
Firing Rate	Operating Hours	NO <sub>x</sub>	CO	PM			
(mmBtu/hr)	(hr/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)
14.9	3,120	2.09	3.25	0.52	0.81	0.21	0.33

ii. These limits are based on standard emission factors, the type of fuel(s), the maximum firing rate(s), and the maximum hours of operation.

iii. The above limitations contain revisions to previously issued construction permit 97050032. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this construction permit,

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limit on the hours of operation has been increased from 2,080 hours per year to 3,120 hours per year and the firing rate for natural gas has been increased from 14.0 mmBtu/hr to 14.9 mmBtu/hr. In addition, the annual emission limits have been increased by 1.21 tons of NO<sub>x</sub>, 0.30 ton of CO, and 0.12 ton of PM. [T1R]

- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected washers and ovens to demonstrate compliance with Conditions 5.5.1, 7.3.3, 7.3.6 pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification number of each cleaning solution used in the affected parts washers;

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- b. The identification of and the percentage by weight of each HAP in each cleaning solution used in the affected parts washers;
- c. Cleaning Solution Usage; lb/mo and ton/yr;
- d. VOM content of the cleaning solution; % by Wt;
- e. Records of the fuel usage for the affected parts washers and ovens, Mft<sup>3</sup>/mo and Mft<sup>3</sup>/yr;
- f. The aggregate monthly and annual VOM emissions from the affected parts washers based on the material usage, with supporting calculations; and
- g. Records of monthly and annual aggregate CO, NO<sub>x</sub>, and PM emissions from the affected parts washers and ovens shall be maintained, based on fuel usage and the applicable emission factors, with supporting calculations.

#### 7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected washer or oven with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The usage of any cleaning solutions containing any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent within 30 days of such an occurrence.
- b. Emissions of VOM in excess of limits in Conditions 7.3.3(e) and/or 7.3.6(a) within 30 days of such an occurrence.
- c. Emissions of PM in excess of limits in Conditions 7.3.3(c) and/or 7.3.6(b) within 30 days of such an occurrence.

- d. Emissions of NO<sub>x</sub> and/or CO in excess of limits in Condition 7.3.6(b) within 30 days of such an occurrence.

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.3.3(b), (c) and (d) is assumed to be achieved by the work-practices inherent in operation of a natural gas-fired parts washers and ovens.
- b. To determine compliance with Conditions 5.5.1, 7.3.3(e), and 7.3.6(a), VOM emissions from the affected coating line shall be calculated based on the following:

$$\text{VOM (lb)} = (\text{Cleaning Solution Usage, lb}) \times (\text{VOM Content of Cleaning Solution, \% by Wt.})$$

- c. To determine compliance with Condition 7.3.6(c), fuel combustion emissions from the affected parts washers and ovens shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/Mft<sup>3</sup>)</u>
CO	21
NO <sub>x</sub>	100
PM	11.9

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 -< 10 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Fifth Edition, October, 1996.

$$\text{Natural Gas Combustion Emissions (lb)} = (\text{Natural Gas Consumed, Mft}^3) \times (\text{The Appropriate Emission Factor, lb/Mft}^3)$$

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after February 23, 2004 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a) of the Act]:

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;



PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to comply with Title I requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

#### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

#### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

## 9.10 Defense to Enforcement Actions

### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.



#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

##### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

## 10.0 ATTACHMENTS

### 10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

#### 10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A (P)^B$$

Where:

P = Process weight rate; and  
 E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

PROPOSED RENEWAL CAAPP PERMIT  
 Nissan Forklift Corp., NA  
 I.D. No.: 111065AAQ  
 Application No.: 95110071  
 July 22, 2004

- c. Limits for Process Emission Units For Which  
 Construction or Modification Commenced On or After  
 April 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;

PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or



PROPOSED RENEWAL CAAPP PERMIT  
Nissan Forklift Corp., NA  
I.D. No.: 111065AAQ  
Application No.: 95110071  
July 22, 2004

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

#### 10.4 Attachment 4 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7.
  - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.
  - b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain

unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

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